

**JOSEPH SAVERI LAW FIRM, LLP**

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*Attorneys for Plaintiffs and the Proposed Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA -- SAN FRANCISCO DIVISION**

ABDI NAZEMIAN, BRIAN KEENE, and  
STEWART O'NAN, individually and on behalf of  
all others similarly situated,

*Plaintiffs,*

v.

NVIDIA CORPORATION,

*Defendant.*

Case No. 4:24-cv-01454-JST

**DECLARATION OF JOSEPH R. SAVERI  
IN SUPPORT OF JOINT STIPULATION  
AND [PROPOSED] ORDER TO  
RESCHEDULE CASE MANAGEMENT  
CONFERENCE PURSUANT TO CIVIL  
LOCAL RULE 6-2**

ANDRE DUBUS III and SUSAN ORLEAN,  
individually and on behalf of all others similarly  
situated,

*Plaintiffs,*

v.

NVIDIA CORPORATION,

*Defendant.*

Case No. 4:24-cv-02655-JST

Judge: Hon. Jon S. Tigar  
Courtroom: 6 – 2nd Floor  
Action Filed: May 2, 2024

Case No. 4:24-cv-01454-JST

**DECLARATION OF JOSEPH R. SAVERI IN SUPPORT OF JOINT STIPULATION AND [PROPOSED] ORDER TO  
RESCHEDULE CASE MANAGEMENT CONFERENCE PURSUANT TO CIVIL LOCAL RULE 6-2**

1 I, Joseph R. Saveri, declare as follows:

2 1. I am an attorney duly licensed to practice in the State of California. I am a partner and  
3 founder of the Joseph Saveri Law Firm, LLP (“JSLF”), counsel of record for Plaintiffs Abdi Nazemian,  
4 Brian Keene, Stewart O’Nan, in this matter. I have personal knowledge of the matters stated herein and,  
5 if called upon, could competently testify thereto. I make this declaration pursuant to 28 U.S.C. § 1746 in  
6 support of the Parties’ Joint Stipulation and [Proposed] Order to Move Date of Case Management  
7 Conference Pursuant to Civil Local Rule 6-2.

8 2. The *Nazemian* Plaintiffs filed their Complaint on March 8, 2024 (*Nazemian* ECF No. 1).

9 3. On March 18, 2024, the Court set the *Nazemian* initial Case Management Conference for  
10 June 18, 2024, at 2:00 P.M., with the Case Management Statement due on June 11, 2024 (*Nazemian*  
11 ECF No. 22).

12 4. On May 24, 2024, Defendant timely filed its Answer to the *Nazemian* Complaint  
13 (*Nazemian* ECF No. 38).

14 5. On May 2, 2024, the plaintiffs in *Dubus, et al. v. NVIDIA Corporation*, No. 3:24-cv-  
15 02655 (N.D. Cal.), filed their Complaint (*Dubus* ECF No. 1).

16 6. Per stipulation, the deadline for NVIDIA to respond to the *Dubus* Complaint is July 1,  
17 2024 unless otherwise extended (stipulation approved by the Court at *Dubus* ECF No. 26).).

18 7. On May 29, 2024, the Court judicially related *Nazemian* and *Dubus* (*Nazemian* ECF No.  
19 47; *Dubus* ECF No. 17).

20 8. The Court set the *Dubus* initial Case Management Conference via Zoom for June 18,  
21 2024, at 2:00 P.M. with the Case Management Statement due on June 11, 2024, which are the same  
22 dates and times as in *Nazemian*.

23 9. The *Nazemian* plaintiffs have a scheduling conflict at 2:00 P.M. on June 18, 2024, that  
24 requires that the Case Management Conference be rescheduled.

25 10. The Parties in both actions have met and conferred, and all are available to attend a  
26 rescheduled Case Management Conference on July 16, 2024, at 2:00 P.M., should the Court be available  
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1 at that date and time, with the Case Management Statement due one week prior to that Conference, on  
2 July 9, 2024.

3 11. The Parties' request to reschedule the Case Management Conference and the deadline for  
4 the Case Management Statement will not alter or otherwise impact the date of any other event or  
5 deadline already fixed by Court order.

6 12. This joint stipulation to reschedule the Case Management Conference will enhance  
7 judicial efficiency.

8 13. The Parties are conferring to schedule their 26(f) conference on or about June 13, 2024.

9 14. This stipulation is made in good faith and not for the purposes of any delay and will not  
10 prejudice any party or the Court.

11 I declare under penalty of perjury that the foregoing is true and correct. Executed this 4th day of  
12 June 2024, at San Francisco, California.

13 /s/ Joseph R. Saveri

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